

**IN THE UNITED STATES DISTRICT
COURT FOR THE DISTRICT OF SOUTH
CAROLINA COLUMBIA DIVISION**

THE SOUTH CAROLINA STATE
CONFERENCE OF THE NAACP,

and

TAIWAN SCOTT, on behalf of himself and all
other similarly situated persons,

Plaintiffs,

v.

HENRY D. MCMASTER, in his official
capacity as Governor of South Carolina;
THOMAS C. ALEXANDER, in his official
capacity as President of the Senate; LUKE A.
RANKIN, in his official capacity as Chairman
of the Senate Judiciary Committee; JAMES H.
LUCAS, in his official capacity as Speaker of
the House of Representatives; CHRIS
MURPHY, in his official capacity as Chairman
of the House of Representatives Judiciary
Committee; WALLACE H. JORDAN, in his
official capacity as Chairman of the House of
Representatives Elections Law Subcommittee;
HOWARD KNAPP, in his official capacity as
interim Executive Director of the South
Carolina State Election Commission; JOHN
WELLS, Chair, JOANNE DAY, CLIFFORD
J. EDLER, LINDA MCCALL, and SCOTT
MOSELEY, in their official capacities as
members of the South Carolina Election
Commission,

Defendants.

Civil Action No. 3:21-cv-03302-JMC-
TJH-RMG

**EXPERT DISCLOSURE BY
PLAINTIFFS**

Plaintiffs The South Carolina State Conference of the NAACP, and Taiwan Scott
(collectively, "Plaintiffs"), by and through undersigned counsel, hereby identify the following
persons they expect to call as experts at trial:

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Plaintiffs certify that written reports prepared and signed by Drs. Bagley, Liu, Ragusa, Imai and Duchin, including all information required by Fed. R. Civ. P. 26(a)(2)(B), were disclosed to Defendants on January 24, 2022.

Plaintiffs further certify that written rebuttal reports prepared and signed by Drs. Duchin, Bagley, and Liu, including all information required by Fed. R. Civ. P. 26(a)(2)(B), were disclosed to Defendants on February 7, 8, and 10 respectively.

Dated: February 10, 2022

Respectfully submitted,

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* Motion for admission *Pro Hac Vice* forthcoming
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